

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W. R. GRACE & CO., et al. ¹)	Case No. 01-01139 (KJC)
)	(Jointly Administered)
Reorganized Debtors.)	
)	Re: Docket No. 31812, 31856, 31873,
)	32044, 32068, 32324, and 32417

**CERTIFICATION OF COUNSEL REGARDING STIPULATION TO ADJOURN
HEARING DATE FOR ANDERSON MEMORIAL HOSPITAL'S MOTION TO ALTER
OR AMEND ORDER DENYING MOTION FOR CLASS CERTIFICATION**

1. On March 5, 2014, Anderson Memorial Hospital ("AMH") filed its Motion to Alter or Amend Order Denying Motion for Class Certification and for Entry of Scheduling Order and Granting Related Relief (the "Motion") [Docket No. 31812]².
2. On March 18, 2014, the Court entered the Order Approving Stipulation for Briefing Schedule and Hearing Date for Anderson Memorial Hospital's Motion to Alter or Amend Order Denying Motion for Class Certification (the "Order") [Docket No. 31873].
3. On October 6, 2014, the Court entered the Amended Order Approving Stipulation for Briefing Schedule and Hearing Date for Anderson Memorial Hospital's Motion to Alter or Amend Order Denying Motion for Class Certification (the "Order") [Docket No. 32417].
4. The Court rescheduled the February 24, 2015 omnibus hearing to March 4, 2015, however counsel for W. R. Grace & Co., et al. ("Grace") is unavailable.
5. The parties consented and agreed that the Motion will be heard on April 14, 2015 at 10:00 a.m.

¹ The Reorganized Debtors comprise W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or "Grace") and W. R. Grace & Co.-Conn. ("Grace-Conn.").

² Capitalized terms not defined herein shall have the meaning ascribed to them in the Motion.

6. The parties have entered into a Stipulation to Adjourn Hearing Date for Anderson Memorial Hospital's Motion to Alter or Amend Order Denying Motion for Class Certification (the "Stipulation").

7. Attached hereto as Exhibit A is a copy of a proposed form of Order Approving Stipulation to Adjourn Hearing Date for Anderson Memorial Hospital's Motion to Alter or Amend Order Denying Motion for Class Certification (the "Order"). A copy of the Stipulation is attached to the Order as Exhibit 1 thereto.

8. By way of this certification, the Reorganized Debtors respectfully request that the Court enter the Order, thereby approving the terms of the Stipulation.

9. Counsel for the parties are available, should the Court have any questions or concerns with the foregoing or the Amended Order.

Dated: February 24, 2015

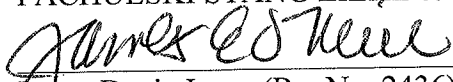
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A handwritten signature in cursive script, appearing to read "James E. O'Neill", is written over a horizontal line.

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